#### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No.: 18-20071

Plaintiff,

Hon. Steven J. Murphy, III

 $\mathbf{v}$ 

D-1 LERON LIGGINS,

Defendants.

#### **MOTION TO RECUSE TRIAL JUDGE**

NOW COMES, Defendant Leron Liggins ("Liggins"), by and through his counsel, Martin E. Crandall, and presents to this Court a Motion for Recusal.

Defendant reviewed the motion hearing transcript of January 30, 2020, which is attached as **Exhibit A**. Defendant believes the commentary of the Court to be indicative of a bias against the Defendant. Defendant himself insists on this motion. Pursuant to Rule 1.2 of the Michigan Rules of Professional Conduct,

a lawyer shall seek the lawful objectives of a client through reasonably available means permitted by law in these rules.

MRPC indicates at Rule 1.3, regarding an attorney's Diligence,

a lawyer should act with commitment and dedication to the interests of the client and with the zeal and advocacy upon a client's behalf...

Defendant's counsel discussed with the Assistant United States Attorney this morning who does not concur in the relief sought.

Respectfully submitted,

CLARK HILL PLC

By: /s/ Martin E. Crandall

Martin E. Crandall (P26824)

500 Woodward Avenue, Suite 3500

Detroit, Michigan 48226

(313) 965-8300

mcrandall@clarkhill.com

Date: October 18, 2021

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# MEMORANDUM OF LAW IN SUPPORT OF MOTION TO RECUSE TRIAL JUDGE

The Rules cited in the attached motion require its filing. Further, 28 U.S.C.

§ 455(a) indicates recusal may be an appropriate remedy.

CLARK HILL PLC

By: /s/ Martin E. Crandall

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Date: October 18, 2021

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2021, my secretary electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all of the parties of record.

/s/ Martin E. Crandall
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